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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 DANIELLE PERREIRA,
18 Defendant.

2:14-cr-00357-APG-VCF

STIPULATION FOR EXTENSION OF
GOVERNEMNT'S TIME TO FILE
RESPONSE
(First Request)

19 IT is hereby stipulated and agreed by the United States of America, by and through DANIEL
20 G. BOGDEN, the undersigned Assistant United States Attorney, Kimberly M. Frayn, and Todd
21 Leventhal, Esq., counsel for Defendant DANIELLE PERREIRA, that the Government will have an
22 an extension of time to file the Government's response to Defendant Perreira's motion to suppress
23 statement (Doc. No. 96), to a date and time convenient to the Court, but not less Monday, September
24 28, 2015, for the following reasons:

25 1. On August 18, 2015, Defendant Perreira filed a motion to suppress her statement
26 (doc. no. 96). The Governmennt's time to file its response to the motion to suppress is presently set
27 for September 4, 2015. However, Government counsel will be out of the office on medical leave
28 beginning on September 2, 2015, which is expected to last two weeks or more.

29 2. The parties agree to the brief extention of time for the Government to file its

responsive pleading, to wit: until September 28, 21015. The defendant is presently at liberty under Pretrial Services supervision. The Government has not been notified of any non-compliance by the defendant with the term of her pretrial release.

3. The brief requested delay will not unduly prejudice the defendant and is not made merely for purposes of delay, but to allow the Government continuity of counsel. Granting of this request will not affect the trial in this matter, which is presently set for November 16, 2015.

This is the first request to extend time for the Government to file its response.

THEREFORE, the parties respectfully requests the Court to extend the Government's time to file its response to defendant Perreira's motion to suppress her statement (Doc. No. 96), to a date and time convenient to the Court, but not before September 28, 2015.

DATED this 31st day of August, 2015.

DANIEL G. BOGDEN
United States Attorney

/s/ Kimberly M. Frayn
KIMBERLY M. Frayn
Assistant United States Attorney

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2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**
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6 UNITED STATES OF AMERICA,

2:14-cr-00357-APG-VCF

7 Plaintiff,

8 vs.

9 DANIELLE PERREIRA,

10 Defendant.

11 ORDER

12 After considering the parties' stipulation agreeing to extend the Government's time to
13 file its response to Defendant Perreira's August 18, 2015 motion to suppress statement (Doc. No.
14 96), to a date and time convenient to the Court, but not less than September 28, 2015, the Court
15 hereby finds good cause to grant the Government's request.

16 THEREFORE, IT IS HEREBY ORDERED that the Stipulation For Extention Of Tme to
17 File Response is GRANTED and the Government shall file its response before midnight on Monday,
18 September 28, 2015.

19 Dated this 31st day of August, 2015.


20 THE HONORABLE CAM FERENBACH
21 UNITED STATES MAGISTRATE COURT JUDGE